



Rocky Flats Citizens Advisory Board Recommendation 2002-2

Comments on the Draft Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation (ER RSOP) Notification #02-09, IHSS 112 - 903 Pad

Approved September 5, 2002

The Rocky Flats Citizens Advisory Board (RFCAB) has the following concerns and comments regarding ER RSOP Notification #02-09 for the 903 Pad Remediation.

1. Remedial Action Objectives:

Concern: Under DOE's end state proposal, all surface soil contaminated with plutonium above a level of 50 pCi/g would be remediated. Yet, the 903 Pad ER RSOP Notification states that the goal of the project will be remediation to the 1996 Tier I action level of 651 pCi/g. Borehole sampling results from previous investigations indicate there may be areas of the pad that would not be subject to remediation if the cleanup goal is 651 pCi/g.

Comment: It should be explicitly stated in this notification that the cleanup goal of the 903 Pad Project shall be consistent with DOE's end state proposal.

2. Postponing the decision on Volatile Organic Compounds (VOCs):

Concern: This notification does not address VOCs as a contaminant of concern.

Comment: RFCAB is concerned that by deferring a decision on VOCs, DOE is at risk of leaving behind soil contaminated with VOCs that will have to be remediated later on. Due to the cost of mobilizing a remediation team, this seems to be a highly inefficient approach. DOE should analyze the problem up front and know what it plans to do with the VOCs before the radiological remediation commences. If there is a highly concentrated source of VOCs underlying the 903 Pad, RFCAB recommends that it be removed or treated in order to reduce the long-term operations, maintenance and monitoring costs associated with the Mound/East Trenches Passive Groundwater Treatment Systems.

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides

recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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